

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS DEFENDANT
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibits A-G and defendant American Medical Systems, Inc. (“AMS”) advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions with prejudice, and terminate AMS from the docket in the actions, parties to bear their own costs. Other defendants remain in these actions, and plaintiffs will continue to pursue these actions against them.

Respectfully:

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Dated: March 24, 2017

EXHIBIT A – HERMAN GEREL, LLP

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:12-CV-01894	Dorothy Minix v. Johnson & Johnson, Ethicon, Inc., Ethicon Women's Health and Urology, Gynecare, American Medical Systems, Inc.

EXHIBIT B – MARLIN & SALTZMAN

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-CV-01060	Hortencia Vigil, Pablo Vigil v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT C – RHEINGOLD VALET RHEINGOLD

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-24265	Ellen Stamler, Stephen Stamler v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT D – THE MILLER FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-CV-14720	Iris Hurt v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT E – THE POTTS LAW FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-CV-10039	Ann Hammer, Thomas Hammer v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-cv-10442	Viviane Huerta v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT F – WATERS & KRAUS

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-10185	Christine V. Tumminelli v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT G – ZEVAN & DAVIDSON

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-CV-00172	Marchell Evette Robertson, Michael Robertson v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on March 24, 2017, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Barbara R. Binis